

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MIDDLE EAST FORUM,

Plaintiff,

v.

LISA BARBOUNIS,

Defendant.

:
:
:
: CIVIL ACTION
: NO. 2:19-cv-05697-JS
:
:
:
:
:
:
:
:
:
:

MOTION FOR EXTENTION OF 8 DAYS TO RESPOND TO DISPOSITIVE MOTIONS

Defendant, Lisa Reynolds-Barbounis hereby moves the Court for an extension an eight (8) day to respond to dispositive motions.

1. Plaintiff and Defendants filed respective motions for summary judgment on October 14, 2021.

2. This Court's ORDER (Case 2:19-cv-05697-JS Document 101) required that responses to disposition motions were due within 6 days after filing, or today, October 21, 2021.

3. Defendant, Lisa Barbounis requests that the date for responses to dispositive motions be moved to October 29, 2021. This would provide the parties with 2 weeks to fashion their responses to motions for summary judgment.

4. Defendant has informed Plaintiffs regarding this request. Plaintiffs did not agree.

5. Defendant makes this request pursuant to the complex issues this case poses and asks for the request so that Defendant has time to adequately respond to Plaintiff's Motion.

6. Defendant seeks this extension to finalize her response to Plaintiffs' Motion for Summary Judgment.

7. Plaintiff presented a seventeen-page fact statement. It is an extremely lengthy process to add all citations to Defendant's response to Plaintiff's statement of proposed facts.

8. Should the Court grant this request, the parties responses to dispositive motions will be due one week from tomorrow, or Friday, October 29, 2021.

9. This request will not alter or effect any other deadline in this case.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's Motion for an extension of eight (8) days to for the parties to file responses to dispositive motions.

BY: /s/ Seth D. Carson
Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street, Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Email: Seth@ DerekSmithLaw.com
Counsel for Plaintiff

DATED: October 21, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Defendant's Motion to be served via ECF.

Sidney L. Gold sgold@discrimlaw.
Sidney L. Gold & Associates P.C.
1835 Market Street, Suite 515
Philadelphia, PA 19103
Tel: (215) 569-1999
Fax: (215) 569-3870
Counsel for The Middle East Forum

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
SETH D. CARSON
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Email: Seth@DerekSmithLaw.com

DATED: October 21, 2021